



MICHAEL A. CARDOZO
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HUGH A. ZUBER
Assistant Corporation Counsel
phone: 212-442-0832
fax: 212-788-9776
email: hzuber@law.nyc.gov

October 26, 2007

BY FACSIMILE – 212-805-6191

Honorable Barbara S. Jones
United States District Judge
Southern District of New York
500 Pearl Street, Room 620
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/29/07 HC

Re: *Mary Fulford v. City of New York, et al.*, 07-CV-8247(BSJ)(RLE)

Dear Judge Jones:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department handling the defense of this action on behalf of defendant City of New York. I am writing with the consent of plaintiff's counsel, Colleen M. Meenan, Esq., to request a sixty-day enlargement of time, from October 30, 2007 to December 29, 2007, within which this office may answer or otherwise respond to the complaint. This is the City's first request for an enlargement of time in this action.

The plaintiff alleges, *inter alia*, violations of her constitutional rights under the Fourth and Fourteenth Amendments, when she was allegedly assaulted and falsely arrested by police officers and maliciously prosecuted on those criminal charges. Plaintiff also appends supplemental state law claims.

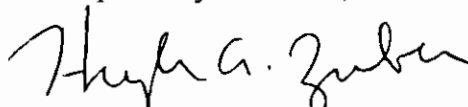
Before this office can adequately respond to the complaint, we will need to conduct an investigation into the facts of the case. Accordingly, the enlargement of time will afford us the opportunity to fully investigate the matter and to secure the relevant documents.

Honorable Barbara S. Jones
October 26, 2007
Page - 2 -

In view of the foregoing, it is respectfully requested that the Court grant the within request extending the City's time to answer or otherwise respond to the complaint until December 29, 2007.

Thank you for your consideration of this matter.

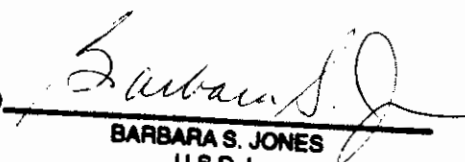
Respectfully submitted,



Hugh A. Zuber (HZ 4935)
Assistant Corporation Counsel

Application GRANTED.

SO ORDERED
Dated:


BARBARA S. JONES
U.S.D.J.
10/28/07

BY FAX 212-226-7716
Colleen M. Meenan, Esq.
Meenan & Associates, LLC
64 Fulton Street, Suite 502
New York, New York 10038